

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Talia N. Harrison,

Plaintiff,

v.

Tyler Technologies, Inc.

Defendant.

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Civil Action No. 4:21-cv-607-ALM

UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF PAGE LIMITS

On April 20, 2023, Plaintiff filed her Reply in Support of Plaintiff's Motion for Award of Attorneys' Fees and Costs. (ECF No. 50.)

Unfortunately, I (local counsel) failed to check that the brief sent to me by lead counsel complied with the page limits established by Local Rule before filing the document, and the brief exceeded page limits. Further, in the PDF conversion process, the document was formatted incorrectly and is now fixed to be compliant with the Local Rules that documents be 12-point font double spaced (this actually increased the page number relative to the brief). I understand there has been some late game non-compliance with local rules as we are wrapping up this case and I personally apologize for the inconvenience to the Court in this regard.

I reviewed the brief to see what fat could be trimmed and managed to get it to ten pages. However, the issues raised in Defendant's Response in opposition to Plaintiff's Motion for Award of Attorneys' Fees and Costs are technical issues that need to be addressed individually. This requires relevant discussion, citations to law and record, and Plaintiff's counsel have even conceded certain billable entries in recognition that the Court should not be made to do a line-by-line analysis of billing records where Plaintiff's counsel can be reasonable. This takes some pages.

I conferred with counsel for Defendant regarding this oversight, and defense counsel very graciously understood that the five pages allotted by Local Rule probably would not be enough to cover these issues and has agreed not to oppose Plaintiff's request for excess pages.

Accordingly, Plaintiff respectfully requests relief from Local Rules regarding page limits to file the brief attached hereto as Exhibit A. A proposed order granting that relief is contemporaneously filed.

Dated: April 21, 2023

Respectfully submitted,

By: s/Melinda Arbuckle
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Counsel for Plaintiff Talia N. Harrison

CERTIFICATE OF CONFERENCE

I conferred with defense counsel on April 21, 2023, regarding the relief requested in this Motion. Defense counsel confirmed that Defendant is unopposed to this Motion.

s/Melinda Arbuckle
Melinda Arbuckle

CERTIFICATE OF SERVICE

On April 21, 2023, I filed the foregoing document with the Clerk of Court for the Eastern District of Texas using the CM/ECF system of the Court. I certify that all counsel of record were served electronically thereby.

s/Melinda Arbuckle
Melinda Arbuckle